

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VISUAL EFFECT INNOVATIONS, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., and SAMSUNG ELECTRONICS CO.,
LTD.,

Defendants.

Civil Action No. 2:18-cv-00184

JURY

**JOINT MOTION FOR EXTENSION OF TIME TO MOVE, ANSWER OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND
WAIVER OF FOREIGN SERVICE REQUIREMENT**

Plaintiff Visual Effect Innovations, LLC (“VEI”) and Defendants Samsung Electronics America, Inc., (“SEA”) and Samsung Electronics Co., Ltd. (“SEC”) (collectively or “Defendants”) jointly, without waiving any defenses described or referred to in Rule 12 F.R.C.P., move the Court to extend the time within which Defendants are required to move, answer or otherwise respond to Plaintiff’s Complaint. In support of the Motion, the Parties state as follows:

1. On May 4, 2018, VEI filed its Complaint (Dkt. 001) alleging patent infringement against Defendants.
2. Defendants request an extension of time for both SEC and SEA to move, answer or otherwise respond to the complaint until August 29, 2018 (90-day extension from the original answer deadline), in exchange for the Korean entity SEC’s agreement to waive formal service of process pursuant to The Hague and consent to service in the action.

3. Defendants' agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, the Parties jointly request an extension, until August 29, 2018, for Defendants to move, answer or otherwise respond to Plaintiff's Complaint for Patent Infringement.

DATED: May 14, 2018

Respectfully submitted,

By: /s/ Nicole D. Galli

Law Offices of N.D. Galli LLC
Nicole D. Galli (PA Bar No. 78420)
Charles P. Goodwin (PA Bar No. 66500)
2 Penn Center Plaza, Suite 910
1500 JFK Blvd
Philadelphia PA 19102
(215) 525-9580

Van Cleef Law Office
L. Charles van Cleef
State Bar No. 00786305 (TX)
PO Box 2432
Longview, TX 75606-2432
(903) 248-8244
charles@vancleef.pro

Attorneys for Plaintiff Visual Effect
Innovations, LLC.

By: /s/ *Melissa R. Smith*
Melissa Richards Smith
melissa@gillamsmithlaw.com
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
903/934-8450
Fax: 903/934-9257

Attorney for Samsung Electronics America,
Inc. and Samsung Electronics Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel of record who have consented to electronic service as this district requires. Local Rule CV-5(a)(3)(A) on this 14th day of May, 2018.

By: /s/ Melissa R. Smith
Melissa Richards Smith